

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

National Association for the Advancement of Colored People, Inc. by and through its Myrtle Beach Branch, Samuel Jones, Leslie Stevenson, and Cedric Stevenson,

Plaintiffs,

v.

City of Myrtle Beach, a municipal corporation within the State of South Carolina and City of Myrtle Beach Police Department, a department of the City of Myrtle Beach,

Defendants.

C.A. NO. 4:18-CV-00554-DCC

AFFIDAVIT OF CAPT. JOEY CROSBY

Captain Joey Crosby with the Myrtle Beach Police Department (“MBPD”) affirms the following:

1. I have been a police officer with the MBPD for 20 years.
2. I am currently a Captain with the MBPD.
3. Part of my duties with the MBPD includes supervising the Strategic Planning Division. As the supervisor of the Strategic Planning Division, I oversee and implement operations plans for the approximately 51 special events Myrtle Beach hosts each year.
4. An operations plan for a special event covers all of the actions MBPD and officers from other departments will have to take in order to make the special event safe and enjoyable. Operations plans cover multiple areas including street closings, barrier placements, officer placements, and parking policies.
5. Operations plans are developed based on the impact they will have on the community. The larger the event – the more complex the operations plan.

6. Despite the complexity of an operations plan, officers must be able to make changes to enforcement and traffic patterns according to the situation on the ground.
7. During Memorial Day Weekend, MBPD takes numerous measures to educate the public about its enforcement measures. MBPD holds community and business outreach meetings to educate the public. It produces a video, "Know before You Go," which is distributed to out of market areas to educate attendees. On its website, the MBPD has an interactive map that provides motorists with directions to a specific destination. MBPD makes numerous posts on Facebook and Twitter, hands out a car tag with relevant information, operates a 24 hour information phone line to answer the public's questions, and offers an app which gives people directions on how to avoid the traffic loop.
8. Approximately 17 miles of the traffic loop runs on State roads.
9. MBPD does not enforce the traffic loop requirements outside of the City's limits. Those requirements are enforced by the SCHP, Horry County and other participating law enforcement agencies together with the Bikefest Task Force.
10. Traffic loops are a common traffic control strategy, and SCHP operates a traffic loop in the Town of Atlantic Beach during the Memorial Day Weekend.
11. Weather is an important factor affecting both attendance and crowd participation. Attendance and crowd participation will determine how traffic control strategies are implemented.
12. The files identified as Myrtle Beach Marathon 2017, Carolina Country Music Fest 2017, MLK Weekend 2017, Jazz Fest 2017, Memorial Day Diversion Plan 2017, Memorial Day Operations Plan 2017, and Memorial Day Brochure 2017 concern the traffic and law enforcement operations for their respective event.

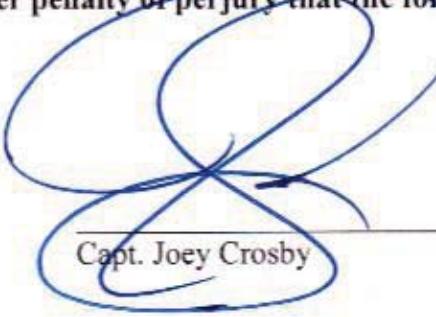
13. The documents in these files were made during the planning of the event by either me or someone with knowledge of the event.

14. The documents in these files were kept in the course of the MBPD's regular activity and creating these files is part of the MBPD's regular activity.

15. The video Capt. Crosby Video is a true and accurate copy of a video where I explained the MBPD's operations plan for the Memorial Day Weekend 2017.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on

March 27, 2018



Capt. Joey Crosby